

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	
)	Bankruptcy Case
CORDELIA OBIAGELI NWONWU aka)	No. 17-12431-KHK
CORDY NWONWU-BERNARD dba NIGERIAN)	Chapter 7
KITCHEN dba OLD TOWN MALL)	
RESTAURANT,)	
)	
Debtor.)	
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)	
WELLS FARGO BANK, NATIONAL)	
ASSOCIATION, AS TRUSTEE FOR CITIGROUP)	
MORTGAGE LOAN TRUST, SERIES)	
2005-OPT4, ASSET BACKED PASS-THROUGH)	
CERTIFICATES, SERIES 2005-OPT4 OR)	
PRESENT NOTEHOLDER,)	
)	
Movant,)	
)	
v.)	
)	
CORDELIA OBIAGELI NWONWU aka)	
CORDY NWONWU-BERNARD dba NIGERIAN)	
KITCHEN dba OLD TOWN MALL)	
RESTAURANT, Debtor,)	
)	
and)	
)	
H. JASON GOLD, Trustee)	
)	
Respondents.)	

TRUSTEE’S RESPONSE AND OPPOSITION TO MOTION FOR RELIEF FROM STAY

COMES NOW, H. Jason Gold, the chapter 7 trustee (“Trustee”), and files this response

H. Jason Gold, Va. Bar No. 19117
Nelson Mullins Riley & Scarborough LLP
101 Constitution Avenue, NW, Suite 900
Washington, DC 20001
(202) 712-2800
Trustee

and opposition to the Motion for Relief from Automatic Stay (the “Motion”), stating to the Court as follows:

1. As reflected on Schedule A, the Debtor owns real property commonly identified as 10189 Farragut Court, Manassas, Virginia 20109 (the “Property”).

2. The Section § 341 Meeting of Creditors is scheduled for August 7, 2017. Until such time as the Trustee completes his investigation of the value of the Property and validity of the liens asserted against the Property, the Trustee opposes the relief from the automatic stay sought in the Motion.

3. The Trustee lacks sufficient information to form a response to the allegations in the Motion that cause exists to grant the relief sought in the Motion and therefore denies the same and demands strict proof.

4. UPON THE TRUSTEE’S FILING OF A REPORT OF NO DISTRIBUTION, THE MOVANT AND THE COURT MAY DEEM THE TRUSTEE’S OPPOSITION AS WITHDRAWN AND GRANT WHATEVER RELIEF THE COURT DEEMS APPROPRIATE.

WHEREFORE, having responded to the Motion, the Trustee prays (i) that the Court continue the hearing on the Motion until such time as the Trustee has had a chance to assess the value of the subject collateral and validity of the liens asserted against the subject collateral; (ii) that in the event that the Trustee files a Report of No Distribution, that the Trustee’s opposition be deemed withdrawn; and (iii) for such other and further relief as may be necessary.

Respectfully submitted,

H. JASON GOLD, TRUSTEE

H. JASON GOLD, TRUSTEE
101 Constitution Avenue, NW, Suite 900
Washington, DC 20001
Telephone: (202) 712-2800
Facsimile: (202) 712-2860

By: /s/ H. Jason Gold
H. Jason Gold, Va. Bar No. 19117

Chapter 7 Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of July 2017 the foregoing Trustee's Response and Opposition to Motion for Relief from Stay was served via Notice of Electronic Filing CM/ECF and pursuant to applicable Standing Order upon:

William M. Savage
SHAPIRO & BROWN, LLP
501 Independence Parkway, Ste. 203
Chesapeake, VA 23320

Office of the US Trustee
115 South Union Street, Ste. 210
Alexandria, VA 22314

Cordelia Obiageli Nwonwu
10189 Farragut Court
Manassas, VA 20109

/s/ H. Jason Gold
H. Jason Gold